

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Michael Kates	:	Chapter 13
Debtor	:	Case No. 16-15025

---

Michael Kates	:
Movant/Debtor	:

v.	:
----	---

Nationstar Mortgage LLC	:
Respondent	:

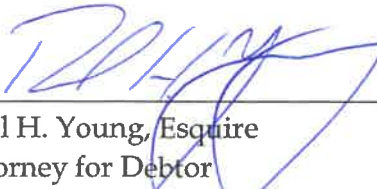
**STIPULATION IN SETTLEMENT OF MOTION TO TURNOVER PROPERTY**

Michael Kates ("Movant" and/or "Debtor") and Nationstar Mortgage, LLC ("Respondents"), by and through their respective counsel, hereby stipulate and agree as follows:

1. Debtor filed this Chapter 13 case on July 15, 2016.
2. Debtor was advised that Respondent is holding a surplus of funds paid on the account in escrow.
3. Debtor has filed a Motion to Turnover Property, requesting an Order be entered directing Respondent to release the escrow surplus funds to Debtor.
4. Debtor desires to use a portion of the funds held by Respondent to satisfy the balance of his Chapter 13 Plan.
5. The parties have agreed to the following to resolve the Motion to Turnover Property:
  - a. Respondent is directed to release all surplus escrow funds to Debtor directly.

- b. Debtor is directed to pay \$3,114.30 to Scott Waterman, Trustee, to satisfy the balance of Debtor's confirmed Chapter 13 Plan.
- c. Debtor is allowed to keep the remainder of any escrow surplus released to Debtor by Respondent.
- d. If the Debtor fails to remit payment to the Chapter 13 Trustee as required by paragraph 5(b) within 10 days of receipt of payment, Respondent may certify Default of this Stipulation with the court and obtain immediate Relief from the Automatic Stay to reinstate foreclosure proceedings.

STIPULATED AND AGREED TO BY:

  
\_\_\_\_\_  
Paul H. Young, Esquire  
Attorney for Debtor  
Young, Marr, Mallis & Deane  
3554 Hulmeville Road, Suite 102  
Bensalem PA 19020  
215-639-5297

6/8/21  
\_\_\_\_\_  
Date

/s/ Kristen D. Little  
\_\_\_\_\_  
Kristen D. Little, Esquire  
Attorney for Respondent  
LOGS Legal Group  
3600 Horizon Drive, Suite 150  
King of Prussia PA 19406  
610-278-6800

May 18, 2021  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Scott Waterman, Trustee

\_\_\_\_\_  
Date